

May 15, 2009

Ms. Laura Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C00075820) is in receipt of your Request for Additional Information dated April 15, 2009 regarding our 2008 Year-End report.

The line 12 receipt from the 2008 President's Dinner Committee was, as indicated on our report, a return of unused start-up transferred funds. The original transfer to the 2008 President's Dinner Committee in the amount of \$ 300,000 was made on 6/5/08, and disclosed on our July 2008 monthly FEC report.

The line 15 receipt referenced in your letter from Command Performance Caterings resulted from a payment to Presidential Catering on 9/26/08. The reimbursements from Darren White for Congress, Friends of Erik Paulsen, Friends of John Boehner, Georgia Republican Party Victory, Jay Love for Congress, Tim Bee for Congress, and Tom Rooney for Congress result not from expenditures to these entities, but from payments made to Kevin McGrann. The reimbursements from Jean Schmidt for Congress, Kirk for Congress, Lee Terry for Congress, and People for English result not from expenditures to these entities, but from payments made to the Republican National Committee.

Your letter references contribution refunds issued to Addison Gravel, Dorothy Lenburg, Barbara Logsdail, Dalene Schadt, and Phyllis Wilcox. In each case, the individual contributor did not exceed \$ 200 in the yearly aggregate, and thus the original contributions were not (and were not required to be) itemized on any Schedule A. We itemized these contribution refunds (which were all in amounts of \$ 200 or less) as a voluntary disclosure.

With regard to the refund of \$ 300 to M. Ray Kelly: we disclosed a \$ 300 receipt from Mr. Kelly on 6/16/08 on page 502 of our July 2008 quarterly report. With regard to the refund of \$ 16,000 to Victoria Lough: we disclosed a \$ 26,000 receipt from Dr. Lough on 6/16/08 on page 853 of our July 2008 quarterly report.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

On Line 21b, the void check (\$ 20,730.20) to Joshua A. Grogis was reissued for the same amount on 12/08/08. The void check (\$ 36,811.96) to Kevin W. McGrann was initially issued for an incorrect amount. The check was reissued in the correct amount of \$ 35,546.96 on 12/08/08. Both of the reissued checks were itemized on our 2008 Year-End report.

The Committee reported on Schedule E disbursements to FLS Connect, LLC, Marathon Strategic Communications, Partida and Associates, Revolution Media Group, and The Innovative Agency LLC as of the date of the expenditures. Once the expenditures qualified by date of dissemination as an independent expenditure, the required 24-hour Schedule E notice was then filed within the appropriate timeframe. Therefore, no amendment is necessary with respect to these disbursements.

The payments referenced in your letter for Facility Rental, Fundraising Phone Calls, Media Consulting, Photography Svc, Postage, and Printing were operating and administrative payments solely benefiting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal

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candidates, nor did they constitute public communications or voter drive activity containing express advocacy.

Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee
